

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

IN RE: Justin Eugene Farris)
) Case No. 19-41126
)
 Debtor(s))

OBJECTION TO CLAIM

Comes now Movant, Justin Eugene Farris and hereby objects to the Proof of Claim filed by creditor, Home Point Financial Corporation, in the amount of \$325,452.43 filed on July 3, 2019. The court claim number is 3-1.

Your claim may be reduced, modified, or eliminated. You should read this document carefully and discuss it with your attorney, if you have one.

PURSUANT TO LOCAL RULE 3007-1 (C), THE CLAIMANT SHALL HAVE 30 DAYS AFTER SERVICE OF THE OBJECTION IN WHICH TO FILE A RESPONSE, IF YOU DO NOT WANT THE COURT TO ELIMINATE OR CHANGE YOUR CLAIM. THE RESPONSE SHALL BE IN WRITING AND STATE WHY THE CLAIM SHOULD BE ALLOWED AS FILED. IF A RESPONSE IS FILED, THE COURT WILL SCHEDULE A HEARING. IF NO TIMELY RESPONSE IS FILED, THE COURT WILL ENTER AN ORDER SUSTAINING THE OBJECTION TO THE CLAIM. PARTIES NOT REPRESENTED BY AN ATTORNEY SHALL MAIL A RESPONSE TO THE COURT AT THE ADDRESS BELOW. DEBTOR(S) NOT REPRESENTED BY AN ATTORNEY MUST BE SERVED A COPY OF THE RESPONSE BY MAIL. IF YOUR RESPONSE IS MAILED, IT MUST BE EARLY ENOUGH SO THAT THE COURT WILL RECEIVE IT ON OR BEFORE 30 DAYS AFTER SERVICE OF THE OBJECTION.

The basis for the objection is as follows:

Home Point Financial Corporation filed a Proof of Claim on July 3, 2019 which listed the regular monthly mortgage payment at \$1,568.23 and the arrears at \$14,803.62. Upon review of the supporting documentation for the proof of claim, it was discovered Home Point Financial Corporation inputted the principle and interest, monthly escrow, and private mortgage insurance data collected from another customers loan. Page 4 of the proof of claim discloses the mortgage arrears and the regular monthly mortgage payment using the supporting documents provided specifically on page 32 and 33 of the Proof of Claim. Those amounts are incorrect as they belong to a different customer. Upon further review of page 6 of the Proof of Claim it shows that the correct ongoing monthly mortgage payment is \$2,609.68 and the correct arrears is \$20,076.80. The proof of claim should be amended to reflect the correct numbers.

Date: August 21, 2019

Respectfully submitted,

/s/ Jason G. Roach

Jason G. Roach #51302
Roach Bankruptcy Center, LLC
851 NW 45th Street, Suite 208
Gladstone, MO 64116
Phone: 816-454-5555
Fax: 816-817-7733
E-mail: roachbankruptcy@gmail.com
Attorney for the Debtors

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served, in addition to the parties notified by the U.S. Bankruptcy Court's electronic notification, upon the affected creditors and other parties in interest, via U.S. Postal Service, first class, postage pre-paid, on this 21st day of August, 2019.

Justin Eugene Farris
7731 North Kansas Avenue
Kansas City, MO 64119

Millsap & Singer LLC
612 Spirit Drive
Chesterfield MO 63005-0000

Home Point Financial Corporation
PO Box 790309
Saint Louis MO 63179-0309

Home Point Financial Corporation
PO Box 619063
Dallas TX 75261-9063

Home Point Financial Corporation
Att: Correspondence
11511 Luna Road
Suite 300
Dallas TX 75234-0000

Home Point Financial Corporation
Att: Loss Drafts
5225 Crooks Road
Troy MI 48098-2823

Home Point Financial Corporation
Att: Payment Processing
Box: 790309
1005 Convention Plaza
Saint Louis MO 63101-0000

Home Point Financial Corporation
11511 Luna Road
Suite 200
Dallas TX 75234-0000

Home Point Financial Corporation
IS AOA/ATIMA
PO Box 5017
Troy MI 48007-0000

Home Point Financial Corporation
CSC-Lawyers Incorporating Service
Company - Registered Agent
221 Bolivar Street
Jefferson City MO 65101-0000

Home Point Financial Corporation
William Andrew Newman, President
2211 Old Earhart Road
Suite 250
Ann Arbor MI 48105-0000

Sottile and Barile, LLC
394 Wards Corner Road
Suite 180
Loveland, OH 45140

/s/ Jason G. Roach

Jason G. Roach #51302

Court address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106